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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendant.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
HALLEY JOSEPHS IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S REPOSE
LETTER TO PLAINTIFF WAYMO
LLC'S PRECIS LETTER
REQUESTING PERMISSION TO
FILE MOTION FOR SUMMARY
JUDGMENT**

Judge: The Honorable William Alsup
Trial Date: October 10, 2017

1 I, Halley Josephs, declare as follows:

2 1. I am an attorney with the law firm of Susman Godfrey LLP. I am a member in
3 good standing of the Bar of the State of New York. I make this declaration based on personal
4 knowledge and, if called as a witness, I could and would testify competently to the matters set
5 forth herein. I make this declaration in support of Defendants Uber Technologies, Inc. and
6 Ottomotto LLC's Reponse Letter To Plaintiff Waymo LLC's Precis Letter Requesting Permission
7 To File Motion For Summary Judgment.

8 2. Attached as **Exhibit 1** is a true and correct copy of a document marked as Exhibit
9 1239 at the deposition of Chelsea Bailey, taken on August 1, 2017.

10 3. Attached as **Exhibit 2** is a true and correct copy of a document marked as Exhibit
11 1263 at the deposition of John Krafcik, taken on August 2, 2017.

12 4. Attached as **Exhibit 3** are true and correct excerpts of the March 24, 2017
13 deposition of Gary T. Brown.

14 5. Attached as **Exhibit 4** are true and correct excerpts of the August 8, 2017
15 deposition of Gary Brown in his capacity as a 30(b)(6) witness for Waymo.

16 6. Attached as **Exhibit 5** is a true and correct copy of a document marked as Exhibit
17 1111 at the deposition of Larry Page, taken on July 17, 2017.

18 7. Attached as **Exhibit 6** is a true and correct copy of a document marked as Exhibit
19 1031 at the deposition of Daniel Chu, taken on April 3, 2017.

20 8. Attached as **Exhibit 7** is a true and correct copy of a document produced by
21 Waymo marked as WAYMO-UBER_00035450-WAYMO-UBER-00035451.

22 9. Attached as **Exhibit 8** is a true and correct copy of a document marked as Exhibit
23 1148 at the deposition of Jennifer Haroon, taken on July 26, 2017.

24 10. Attached as **Exhibit 9** is a true and correct copy of a document marked as Exhibit
25 1144 at the deposition of Jennifer Haroon, taken on July 26, 2017.

26 11. Attached as **Exhibit 10** is a true and correct excerpts from Defendants Uber
27 Technologies, Inc. and Ottomotto LLC's First Supplemental Responses to Waymo's First Set of
28 Common Interrogatories (Nos. 1-3).

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed this 24th day of August, 2017, in San Francisco, California.

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4 /s/ Halley Josephs

Halley Josephs
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ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Halley Josephs has concurred in this filing.

Dated: August 24, 2017

/s/ Arturo J. González

ARTURO J. GONZÁLEZ